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Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of Section 73.202 (b),
Table of Allotments
FM Broadcast Stations
(Alamo, Georgia)

) Docket No.01 - 111
) RM-10341
)
)

REPLY COMMENTS OF TEL-DODGE BROADCASTING CO.

Tel-Dodge Broadcasting Co. ("Tel-Dodge"), licensee of station WMCG(FM),
Milan, Georgia, hereby files these reply comments as permitted by the Public Notice,
Report No. 2520, released December 14, 2001.

1. Tel-Dodge filed an application on May 22,2001, requesting authority to move
its existing its transmission facilities on channel 285C2 to a new site. (See File No.
BMPH-20010522AAD). The proposal in said application is mutually exclusive with the
proposal to allot channel 287C3 to Alamo, Georgia, now pending in the captioned
rulemaking proceeding, because the distance between the transmitter sites specified in the
Tel-Dodge application and in the Alamo Notice of Proposed Rulemaking is less than that
required by the Commission's spacing requirements for second adjacent channel FM
radio stations of the classes indicated.

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2. In an effort to determine whether changes in the two proposals might permit
Tel-Dodge to move its transmitter site while at the same time provide a channel for a first

local transmission service to the small town of Alamo, Tel- Dodge asked its consulting engineer to prepare the study attached hereto. As demonstrated therein, if Tel- Dodge amends its application to specify a slightly different site and the proposal in the captioned rulemaking proceeding is changed to specify a Class A station on channel 287 for Alamo, both proposals can be accommodated within the technical parameters of the Commission's Rules. Tel- Dodge submits that adoption of the two changes described above would better serve the mandate of Section 307 (b) of Communications Act than either the Class C3 proposal pending in this proceeding or the site proposal pending in Tel-Dodge's application, only one of which can be granted. Accordingly, Tel-Dodge respectfully requests the Commission, on its own motion, to change the channel to be allotted to Alamo from 285C3 to 287A and order Tel-Dodge to amend its application to specify the site described in the attached exhibit.

3. Tel- Dodge represents to the Commission that it will amend its pending application for authority to move WMCG's transmitter site immediately upon receiving an order from the Commission, and that if channel 287A is allotted to Alamo, Georgia, it will file an application for a permit to construct a new station on said channel, and, in the event that application is granted, it will immediately construct the new station.

Respectfully Submitted,

TEL-DODGE BROADCASTING CO.

By


Lawrence J. Bernard, Jr.

5224 Chevy Chase Parkway, NW
Washington, DC 20015
(202) 237-8215

December 31, 2001

TEL-DODGE BROADCASTING CORPORATION

WMCG

MILAN, GEORGIA

DECLARATION

I declare, under penalty of perjury, that I have prepared the attached Engineering Exhibit for Tel-Dodge Broadcasting Corporation, and that all of the facts therein, except for facts of which the Federal Communications Commission may take official notice, are true to the best of my knowledge and belief; and that I am a Registered Professional Engineer in the States of Georgia and North Carolina.

Executed on December 31, 2001.

A handwritten signature in dark ink, reading "William A. Culpepper", is written over a horizontal line.

William A. Culpepper

William Culpepper & Associates
900 Jefferson Drive
Charlotte, NC 28270
704-365-9995

TEL-DODGE BROADCASTING CORPORATION

MILAN, GEORGIA

NARRATIVE

This engineering exhibit supports the attached Comment of Tel-Dodge Broadcasting Corporation (Tel-Dodge).

Tel-Dodge has filed a minor change application (20010522AAS) to modify its construction permit (BPH-19920206IG). This application is mutually exclusive with a Petition for Rule Making to allot channel 287C3 to Alamo, Georgia (01030720).

If the proposed Alamo allotment were changed to class A channel 287 with a reference point at 32° 09' 02" north and 82° 37' 25" west, Tel-Dodge would change the reference in its application to 32° 22' 59" north and 83° 08' 30" west. This arrangement would provide Alamo with a first local radio service, and permit Tel-Dodge to expand its present service. The suggested Alamo reference is 14.76 kilometers at 088 degrees from the city reference, and it will provide a 70 dBu signal over all of Alamo.

Page 3 shows spacings from the suggested Alamo reference site to relevant facilities. The area surrounding this reference point is rural, assuring the availability of a site that will meet all spacing requirements and provide a 70 dBu signal over the principal community.

TEL-DODGE BROADCASTING CORPORATION
MILAN GEORGIA
PETITION TO ALLOT CHANNEL 287 TO ALAMO GEORGIA
SPACINGS FROM ALTERNATE SITE

REFERENCE

32 09 02 N

82 37 25 W

CLASS = A

Current Spacings

DISPLAY DATES

DATA 05-02-01

SEARCH 12-30-01


----- Channel 287 - 105.3 MHz -----

Call	Channel	Location		Dist	Azi	FCC	Margin
WRHQ	LIC 287C3	Richmond Hill	GA	142.02	94.2	141.5	0.52
WMCG.C	CP 285C2	Milan	GA	55.20	298.1	54.5	0.70
WIFOFM	CP 288C3	Jesup	GA	89.28	132.9	88.5	0.78
WKUB.C	CP 286C2	Blackshear	GA	109.88	167.9	105.5	4.38
WKUB.A	APP 286C2	Blackshear	GA	112.60	162.0	105.5	7.10
WKUB	LIC 286C3	Blackshear	GA	103.25	162.3	88.5	14.75
WBYZ	LIC 233C	Baxley	GA	43.59	158.0	28.5	15.09
WIFOFM	LIC 288A	Jesup	GA	89.28	132.9	71.5	17.78
WMCG	LIC 285A	Milan	GA	51.45	242.5	30.5	20.95
WSTIFM	CP 287C3	Quitman	GA	171.15	210.0	141.5	29.65
WAYS	LIC 288C3	Macon	GA	119.05	314.4	88.5	30.55
WBMZ	LIC 285A	Metter	GA	61.21	63.0	30.5	30.71
WHVL.C	CP 284C3	Hinesville	GA	89.60	111.3	41.5	48.10
WYAI.A	APP 287C1	Bowdon	GA	249.55	304.8	199.5	50.05
WYAI.C	CP 287C1	Bowdon	GA	249.91	304.8	199.5	50.41
WBTY	LIC 288A	Homerville	GA	125.83	190.5	71.5	54.33
WSTIFM	LIC 287A	Quitman	GA	171.15	210.0	114.5	56.65
WZNY	LIC 289C	Augusta	GA	158.91	27.2	94.5	64.41

Certificate of Service

I hereby certify the copy of the foregoing Reply Comments were sent to the following named person via first-class mail on this 31st day of December, 2001:

Dan J. Alpert, Esq.
2120 North 21st Road
Arlington, Virginia 22201


Lawrence J. Bernard Jr.